

EXHIBIT 1

Plaintiffs' More Definite Statement as to Defendants Al Farooq Mosque, Islamic Call Organization, Mohammed Al Massari, Global Jihad Fund, Al Muhajiroun Group, Saudi Commission for Relief and Charity Work Abroad, Abu Hafs the Mauritanian, Agus Budiman, Ahmed Ressam, Said Bahaji, Zakariya Essabar, Mohammed Ali Hasan Al Moayad, Ibrahim Muhammad Afandi, Abdulrahman Hassan Sharbatly, Ahmed Zaki Yamani, Ahmad Al Harbi, Mohammed Al-Issaim, Hamad Hussaini, Mohamed Loay Bayazid (a.k.a. Abu Rida Al Suri), Ahmed Brahim, Abu Musab Al-Zarqawi, Ayman Al-Zawahiri, Abu Ibrahim Al-Masri, Mohammad J. Fakihi, Mohamed Bin Mohamed Abdelhedi, Kamel Darraji, Imed Ben Bechir Jammali, Habib Ben Ahmed Loubiri, Chabaane Ben Mohamed Trabelsi, Swar Al Dhahab, Abu Hamza Al Masri, Ramzi Ahmed Yousef, Abu Bakar Bashir, Abdul Hakim Murad, Tawfiq Bin Attash, Samir Salah, Ayadi Chafiq Bin Muhammad, Muhammad Ali Harrath, Abu Muhammad Al-Maqdesi, Khalid al Mihdhar, Majed Moqed, Nawaf al Hazmi, Salem al Hazmi, Hani Hanjour, Satam M.A. al Suqami, Waleed al Shehri, Wail al Shehri, Mohamed Atta, Abdul Aziz al Omari, Marwan Al-Shehhi, Fayez Banihammad, Ahmed al Ghamdi, Hamza al Ghamdi, Mohand al Shehri, Saeed al Ghamdi, Ahmad al Haznawi, Ahmed al Nami, and Ziad Samir Jarrah

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in *Burnett, et al. v. Al Baraka Investment and Development Corp., et al.*, 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849.

Al Farooq Mosque

2. Federal affidavits filed in the Mohammed Ali Hassan al-Moayad case show a Yemeni al Qaeda fundraiser and professed friend of Osama bin Laden told a federal informant that money was being collected at the Al-Farooq mosque in Brooklyn, NY for the purposes of supporting jihad and Osama bin Laden. Jihad fundraising sessions were conducted at the Al-Farooq mosque in December 1999. The total amount of money collected in a single two-day period was reported as around \$10,000.

3. Al-Farooq had previously served as the headquarters for the Al-Kifah Refugee Center, the U.S. branch of Makhtab-e-Khidamat al-Mujahideen (“Office of Mujahideen Services”)—named by the U.S. government as a Specially Designated Global Terrorist entity (SDGT) and labeled as the “direct precursor” to al Qaeda.

4. The Al-Farooq mosque was a frequent host to lectures by al Qaeda founder Abdullah Azzam and Egyptian Al-Gama`at al-Islamiyya leader Sheikh Omar Abdel Rahman.

Islamic Call Organization

5. Islamic Call Organization (ICO) is the U.S. branch of the Khartoum-based Islamic Call Organization (a.k.a. Islamic Da`wa Organization, Munazzamat Al-Da`wa Al-Islamiya (MDI)). MDI is administered by a Board of Trustees comprised of members from several Muslim countries and chaired by the ex-President of Sudan and retired Field Marshal Abdul Rahman Siwar Al Dhahab.

6. During his term of martial law, Al-Dhahab upheld relative strict Islamic shari`a law in the Sudan. In 1985, his government initiated a deliberate policy “of arming Arab tribal groups” in order to offset the influence of the Sudanese People’s Liberation Army (SPLA). Those Islamic militia groups have been subsequently accused of gross human rights violations, including the standardized practice of slave-trading.

7. The website of ICO is <http://www.ico-usa.org>. A WHOIS search on that domain name indicates that ICO’s website was hosted and maintained by Bayan Elashi at the Infocom Corporation, based in Richardson, Texas.

8. On September 6, 2001, FBI agents, along with agents from the State Department, U.S. Customs and the U.S. Secret Service, raided the headquarters of Infocom for allegedly providing material support to Hamas, a designated foreign terrorist organization (FTO). The office was evacuated, searched, and surrounded by more than 50 federal agents during the raid.

9. Materials seized in the raid on Infocom were also cited in the federal case against suspected al Qaeda member and fundraiser, Benevolence International Foundation (BIF) chief Enaam Arnaout.

10. ICO's main Sudanese bank account for donations is hosted by the Al-Shamal Islamic Bank in Khartoum. Al-Shamal is reputed to have been created as a joint project between the Sudanese National Islamic Front (NIF) and Osama bin Laden, who allegedly invested \$50 million of his own personal funds in the bank.

11. ICO received a \$2,000 donation from the International [Islamic] Relief Organization (IIRO) in Northern Virginia in 1997.

12. Christian Solidarity Worldwide (CSW) has accused MDI in its 2002 human rights report on the Sudan of being a religious charity "associated with tying aid for famine victims to conversion to Islam."

13. In the summer of 2002, a mysterious dispute arose between the government of the Sudan and MDI. On June 9, 2002, Sudanese security forces detained the Secretary-General of MDI, Dr. Elamin Mohammed Osman. Security forces and government officials told reporters that they were not willing to release him from detention unless he resigned from MDI or was removed by the Board of Trustees. On July 10, Sudanese authorities arrested three more members of the MDI Secretariat General. The number of MDI detainees reached 12 in total, until all were inexplicably released in the days leading up to July 28.

Mohammed Al Massari

14. Muhammed Al-Massari is the head of the Committee for the Defense of Legitimate Rights (CDLR). CDLR is among the most militant Islamic fundamentalist groups in the world. In the weekly newsletter *Al Huquq*, Al-Massari attested in June 1996 that, "the battle against the Jews is a specific obligation on all Muslims until they annihilate them and drive them

out of Palestine." After the bombing of a U.S. facility in Riyadh in 1995, he explained that the presence of American forces was a colonialist one that violated Islamic law. He indicated that although the Saudi government was the particular target of such acts of terrorism, "the Americans were an easy target on the road, which does not cause ideological or religious problems." Muslih Shamrani, one of the terrorists convicted in the Riyadh attack, cited Al-Massari as one of his primary ideological influences.

15. A Denver-based group headed by Dr. Al-Massari known as the Action Committee for the Rights of Middle East Minorities is directly linked to a man named Khalid Fawwaz. Fawwaz is listed in U.S. District Court criminal documents as a co-conspirator in the 1998 East Africa bombings and the leader of an organization called the "Advice and Reformation Committee," created by Osama Bin Laden. In August 1996, Fawwaz transmitted a statement from Bin Laden stating publicly that "the United States forces stationed on the Saudi Arabian peninsula should be attacked."

16. CDLR is the lead sponsor and sits on the Board of Trustees for the Islamic Gateway website (<http://www.ummah.net>). The Islamic Gateway provides free webspace to radical Islamic organizations, and its administrators actively defend, promote, and publicize these groups and their violent messages of hate and intolerance. Al-Massari is Islamic Gateway's Chairman of the Board. CDLR's website on the Islamic Gateway has become a hotbed of anti-Western condemnations and calls to violence. The group published many of its communiqués and documents directly on the site. The statements admonish Muslims that "your rights and freedom will not be presented to you on a plate by your arrogant oppressors, but they will be seized by the honourable people who have grown tired by such continual oppression... the oppressors must be made aware of the fact that the Muslim Nation has become enraged and

exasperated with those who oppose and defy their faith, despoil their honour and deprive them of their dignity." In the wake of the bombing of the U.S. Khobar Towers military barracks in August 1996, an online communique called upon "all Muslims all over the world to be on full alert to foil the conspiracy of the US and the Zionists, together with their Al-Saud puppets." Another communique on the site lauded the bombing attack as "only one manifestation of evolving reality of the coming battle being forced on all Muslims, not only those of the Arabian Peninsula... but of the whole world." The document went on to warn that if the American presence continued in the Middle East, "many disappointed young men and women may resort to violence and bloodshed."

17. On February 11, 1998, Al-Massari was one of the principle authors of a declaration of war against the U.S. and British governments for their policy on Iraq. The fatwa, or religious edict, represented "a message for the US and the British Governments or any other government of non-Muslim countries... to stay away from Iraq, Palestine, Pakistan, Arabia etc. or face a full scale war of Jihad which will be the responsibly [sic] and the duty of every Muslim around the world to participate in." Moreover, it called upon all Muslims worldwide "including the Muslims in the USA and in Britain to confront by all means whether verbally, financially, politically or militarily the US and British aggression."

Global Jihad Fund

18. In 1996, Muhammed Sohail appealed to Muslims on the internet for help in designing a brand new Islamic Gateway. He explained that "Islamic Gateway wants to use the net (apart from conventional use) also for welfare infrastructure and jihad infrastructure activities." The result of that desire was the birth of the Global Jihad Fund (GJF), which

according to its homepage on ummah.net, "is a Project of Islamic Gateway." Visitors to the GJF site are shown a monograph of several flags, including those of the U.S., U.K., France, and Israel. Superimposed over this image is an Arabic phrase, commanding faithful Muslims to "kill them all until there will be no more struggle and the word of Allah will be the only one." The site continues by explaining that "the main aim... of Global Jihad Fund is to facilitate the Growth of various Jihad Movements around the World by supplying them with sufficient Funds to purchase Weapons and train their Individuals."

19. In August 1998, Sohail confirmed in another Internet newsgroup posting that "GJF supports Sheikh Mujahid Osama bin Laden." On the GJF website, there are a number of articles dealing with the subject of jihad. Among the most shocking is an alleged interview with a Pakistani child who claimed to have been to Afghanistan on several occasions "to wage jihad." In addition to expressing his enjoyment at helping to kill the enemy, the young man explained that his future goal was to give the United States "a good beating."

20. The GJF maintains a relatively sophisticated fundraising network in London for the purpose of aiding international Islamic "holy warriors" in such places as Bosnia, Afghanistan, Kashmir, Kosovo, and Chechnya. One of the bank accounts it lists for Muslims to donate to is that of the Pakistani group Lashker Taiba, which recently sponsored a mujahideen conference that began with the unveiling of a 40 foot long banner which "portrayed Lashker's dagger penetrating the national flags of USA, Russia, UK & India & Israel." The GJF website encourages Muslims outside of London to "Start a Jihad Support Network in your city... don't be afraid of [the tyranny of the infidels]." The website also offers "jihad military training" in several undisclosed locations. Part of that training involves intensive martial arts and hand-to-hand combat education. A Sunday Telegraph investigation also revealed that, as a result of this call to

action, "dozens of volunteers are being drilled in the use of guns and explosives," allegedly "to prepare them for the military wing of the International Islamic Front," the organization founded by Osama bin Laden. When e-mailed, the coordinators of the military training confirmed that, indeed, they were recruiting international volunteers, including from the United States.

21. Muhammed Sohail, has been engaged in a vigorous propaganda campaign for the Committee for the Defense of Legitimate Rights (CDLR) and Al-Muhajiroun, two of the most militant Islamic fundamentalist groups in the world; and other militant Islamic organizations. In a January 1998 newsgroup posting, Sohail accused the Saudi government of inviting "the infidel American forces to occupy the holy land" and pleading for Muslims to "Support the Islamic opposition to the criminal Al-Saud regime... Support the CDLR!! The Struggle needs you." In March 1998, Sohail posted another message from a CDLR-aligned group called Muslims Against Saudi Tyranny (MAST). The group identified itself as "opposed to the saudiwhitehouse regime in Arabia" and supportive of "Sheikh Osama bin Laden... Islamic Ameerate in Afghanistan (Taliban government), Chechen mujahideen and government, [and the] Kosovo Liberation Army." To drive home the fanatic nature of the group, Sohail sent another e-mail message intimating an unspoken connection between MAST and a terrorist support network known as "The Friends of Osama bin Laden": "MAST is not linked in any way (says our lawyer) with the Friends of Osama bin Laden. 'Friends' are not 'peaceful and nonviolent' - they prefer the bodybag approach." Following the U.S. missile attacks against Afghanistan and the Sudan in August 1998, Sohail announced on yet another Internet newsgroup that "the global alliance of democracy, sodomy and international-law (unholy trinity) has attacked the bases of Sheikh Mujahid Osama bin Laden... we Muslims must support the Sheikh against the crusader-zionist world government (new world whoreders)." Sohail finished his message by quoting the Prophet

Muhammed: "Perform jihad against the disbelievers, with your wealth, yourselves and your tongues." After being confronted by reporters for the British Sunday Telegraph about his statements, Sohail admitted being "connected with both the [Global Jihad Fund] and the Islamic Gateway." He explained: "I work as a volunteer helping with things such as fundraising and recruitment for organizations involved in Jihad." He then went further and affirmed "I work for two people, really, Mr. Massari and Osama Bin Laden."

22. Sohail's former employer, the British company Railtrack, fired him after it discovered that he had been using his work e-mail address for GJF activities. Subsequently, Sohail's name was quickly removed from the Islamic Gateway and Global Jihad Fund webpages because, according to Islamic Gateway staff, "problems are faced by the authorities to him if he continues." His position as administrator of the Islamic Gateway was filled by Ahmed Selim (a.k.a. Abu Azzam, Abdul Hamid, Abdul Halal). Selim confirmed that though Sohail "will be offline from now on, [he] may come back for a while." But Selim promised that he personally would "continue to support the project... and make sure that its not stopped by the [infidels]."

23. The chairman and president of the GJF is Muhammed Al-Massari of CDLR.

Al Muhajiroun Group

24. Al-Muhajiroun, "the Immigrants," was founded by Shaykh Omar Bakri Muhammad, who fled from Saudi Arabia in 1985 after he was threatened with arrest for advocating jihad (holy struggle). Al-Muhajiroun is among the most militant Islamic fundamentalist groups in the world.

25. On February 11, 1998, both Omar Bakri and Al-Massari were the principle authors of a declaration of war against the U.S. and British governments for their policy on Iraq. The fatwa, or religious edict, represented "a message for the US and

the British Governments or any other government of non-Muslim countries... to stay away from Iraq, Palestine, Pakistan, Arabia etc. or face a full scale war of Jihad which will be the responsibly [sic] and the duty of every Muslim around the world to participate in." Moreover, it called upon all Muslims worldwide "including the Muslims in the USA and in Britain to confront by all means whether verbally, financially, politically or militarily the US and British aggression."

26. In May 1998, when Britain was considering deporting several individuals connected with the Egyptian terrorist group al-Jihad, Omar Bakri threatened "to respond to this British terrorism with fundamentalist terrorism." Less than one year later, in response to renewed British bombing of Iraq, a member of Al-Muhajiroun attacked a British army base with a firebomb. More recently, Omar Bakri gained much notoriety in July 1999 when he issued "An Open Call to Sheikh Osama Bin Laden," encouraging the wanted terrorist to "aim [his] weapons at the occupying forces" and ordering all Muslims to "stand and engage in Jihad or support the Mujahideen [holy warriors]." Before establishing an independent website of their own, Omar Bakri and his disciples used their webspace on the Islamic Gateway to propagate their attempts to "rid [them]selves from the shackles of democracy and secularism... and once and for all and work together for the implementation of the Khilafah and the domination of Islam world wide... [which is] inevitable." The Al-Muhajiroun website has regularly provided a variety of calls for Muslims to engage in a military jihad against the U.S. and its allies; it appeals to Muslims to "let not the struggle launched by the mujahideen last year against the US occupiers have been in vain." The site furthermore proclaims the intention of Al-Muhajiroun to form a "fifth column" of Muslims in Great Britain for the purpose of penetrating "strongly in society and to become in position to overthrow the British [infidel] regime."

Saudi Commission for Relief and Charity Work Abroad

27. On September 25, 2001, six U.S. special forces Green Berets traveling in four rented SUVs raided the local headquarters of the Saudi High Commission for Relief in Ilidza. Despite its close links to the government of the Saudi Arabia, the High Commission was still allowed to be raided “because it seemed to be a meeting point and a central location for some of the guys [SFOR intelligence agents] were trailing or monitoring,” according to one NATO source. Aided by supporting Italian carabinieri stationed with the military police, the Americans arrested two more suspects and seized a number of intriguing documents. The NATO officer added, “That’s when we discovered the extent that NGOs are used as a cover for some suspicious activities.” Representatives of the American government reportedly confronted the Saudi ambassador in Sarajevo with the damning evidence, who was “surprised, and [he] promised to look into it.” The U.S. subsequently asked the Bosnian government to officially shut down the local operations of four Islamic charities, including the Saudi High Commission. In July 2001, the High Commission publicly disclosed that over nine years, it had collected \$600 million for its programs in Bosnia.

28. At the time of his arrest, the alleged Saudi murderer of a British aid worker in Bosnia, Paul Goodall (who was killed execution-style in early 1994 near Zenica), was a foreign mujahid carrying an identification card issued by the Zenica office of the Saudi High Commission for Relief.

29. In 2001, Bosnian police apprehended a number of suspected terrorists who were later sent to a U.S. holding facility in Guantanamo Bay, Cuba. One of the men—Algerian Saber Lahmar—was an employee of the Saudi High Commission in Bosnia. Lahmar was a known member of the Algerian Armed Islamic Group (GIA) – designated by the United States as a

foreign terrorist organization – , and had fled prosecution in Algeria. He later married a Bosnian woman, and his father-in-law turned out to be a past employee at the U.S. embassy in Sarajevo. Following the comprehensive Bosnian police investigation in 1997, Lahmar was caught and sentenced to prison for armed robbery and home invasion, but was soon pardoned in 2000 in a general amnesty. He was again apprehended in late October 2001, when caught among a group of eleven Islamic militants plotting to fly small aircraft from the tiny airport at Visoko in central Bosnia and suicide crash them into two NATO military bases in Tuzla and Bratunac.

Abu Hafs the Mauritanian (a.k.a. Mahfouz Ould Al-Walid, a.k.a. Khalid Al-Shanqiti, a.k.a. Mafouz Walad Al-Walid)

30. The 9/11 Commission Final Report called Abu Hafs the Mauritanian (a.k.a. Mahfouz Ould Al-Walid, a.k.a. Khalid Al-Shanqiti, a.k.a. Mafouz Walad Al-Walid) a senior al Qaeda “theologian.” He is the operational planner thought responsible for helping to organize the 1998 bombings of two U.S. embassies in East Africa and an attempted series of terrorist plots to coincide with the Millenium—including bombing attacks at Los Angeles International Airport.

31. The 9/11 Commission report stated that would-be al Qaeda terrorist operatives—including some of the actual 9/11 hijackers—would approach Abu Hafs the Mauritanian if they were seeking to “participat[e] in a suicide operation.”

32. Abu Hafs the Mauritanian is related through marriage to Mohamebdou Ould Slahi and is believed to be his associate within al Qaeda. Slahi, a resident of Duisberg, Germany, helped recruit and organize at least two separate networks of terrorist sleeper cells—including the 9/11 hijackers.

Agus Budiman

33. FBI special agent Jesus Gomez linked Agus Budiman, an Indonesian driver for a food delivery service, to three 9/11 hijackers, including suspected ringleader Mohammed Atta and two others believed to have close ties to the terrorists.

34. Gomez testified that Ziad Jarrah, the official hijacker-pilot of Flight 93, used Budiman's name to get into the United States, and Ramzi Binalshibh tried twice unsuccessfully to use Budiman's name to get into the country.

35. In late November 2001, Budiman was officially charged for helping a man named Mohammad Bin Nasser Belfas obtain a false Virginia driver's license.

Ahmed Ressam

36. Ahmed Ressam, a native of Algeria, fled his homeland after being accused by Algerian authorities of arms-trafficking for Islamic fundamentalists in North Africa. He traveled first to France, and then to Montreal in 1994. Unable to find employment, he turned to petty crime as a means to finance his desired lifestyle in the West.

37. In June 1995, a Canadian judge found Ressam guilty of shoplifting, fined him \$100, and ordered him to leave Canada by July 23, 1995. Ressam's deportation order was never executed by Canadian Immigration officials, and Ressam never left.

38. Ressam developed his skills enough to gain the attention of a wealthy and influential member of the Montreal Muslim community who was working closely with Ressam's then-roommate, al Qaeda operative Fateh Kamel. At the time, Kamel was using his storefront business as a cover for his growing role as an international terrorist mastermind. He employed Ressam as an invaluable source of passports, credit cards, petty theft, and the other necessary functional tools of terrorist activity. French Judge Jean-Louis Bruguière later testified in U.S.

court that Fateh Kamel had become the leader of yet another “conspiratorial cell,” this time based out of Montreal.”

39. Kamel and others at Place de la Malicorne drew Ahmed Ressam deep into their world of radical Islam. The men discussed the GIA terror attacks in France and agreed that it would be a good thing to carry out another operation in France in the future. They brought Ressam into the mosque to listen to the wisdom of Abderraouf Hannachi, an older Tunisian-born man who originally came from a rural family in Tunisia and immigrated to Canada in 1994 “to make a life for himself, like other Tunisians.” Hannachi had few successes at finding employment with little education or formal experience. But, Hannachi was always regular about his daily visits to the local As-Sunnah An-Nabawiya Mosque in Montreal, where he was considered a respected and influential personality. At the As-Sunnah mosque, Abderraouf Hannachi railed against Western culture as a regrettable disease and expressed his burning hatred of the United States. He also spoke proudly of how he had been trained by al Qaeda experts at the Khalden camp in eastern Afghanistan and how this life was only meaningful if offered as sacrifice for the next.

40. The Malicorne gang all worshipped Hannachi and Fateh Kamel, who were highly respected as men of status in the local Muslim community. Ressam and the others dreamed of achieving similar glory in the name of Islam and began planning their own *jihad* fantasy.

41. In the trial of one of his co-conspirators, Ressam testified that he became firmly convinced to join the *mujahideen* after several of his friends returned to Montreal in 1997 from al Qaeda camps in Afghanistan. According to Ressam, “My friends came back and talked to me about the training that they have received, the learning that they have gotten, and about jihad, and I got—they encourage me—so I got interested.” He further explained that he had

approached Hannachi, “a friend who was [formerly] in Afghanistan,” to arrange the details of his own planned journey to join al Qaeda. Several members of the Malicorne gang quietly left Montreal in March 1998 on a quest to seek military training in Afghanistan. Ressam flew to Karachi, Pakistan, where Abderraouf Hannachi had arranged contacts for him with notorious Afghano-Bosniak terrorist training camp manager Abu Zubaydah.

42. In court, Ressam explained Abu Zubaydah’s role in the al Qaeda network: “[h]e is the person that is charge of the camps. He receives young men from all countries. He accepts you or rejects you. And he takes care of the expenses of the camps. He makes arrangements for you when you travel coming in or leaving.” In Karachi, Abu Zubaydah gave Ahmed Ressam a new identity, Afghan clothes, and an authorized letter of transit to a guesthouse in Jalalabad. Shortly thereafter, Ressam was moved on to the nearby Khalden training camp. The camp had about 100 total men, divided into cells of between 6 and 14 recruits each. The cells were taught to exist and operate independently of any central command structure. At the Khalden camp, Ressam took part in military training conducted by two members of the Jordanian Millenium terror cell identified as “Khaled” and “Mughirah.”

43. According to Ressam, at Khalden, they learned “how to blow up the infrastructure of a country... Electric plants, gas plants, airports, railroads, large corporations... Hotels where conferences are held.” While in Afghanistan, Ressam also participated in gruesome chemical weapons experiments on dogs and learned “how to mix poisons with other substances, put them together and smear them on doorknobs... designed to be used against intelligence officers and other VIPs.”

44. At “theoretical sessions,” members of the cells studied and discussed strategy behind past terror operations, including *Hizballah*’s war against the U.S. in Beirut and the failed

1995 assassination plot on Hosni Mubarak in Addis Ababa. Every Friday at Khalden, they would all meet and discuss ways to establish terror support networks on the ground in Algeria, Europe, and North America. Al Qaeda religious and military officials, such as Shaykh Omar Abdel Rahman's son Asadallah, would lecture to the cells about important targets and the priorities of the *jihad* movement.

45. Ressam later testified in court, "we were speaking about America as an enemy of Islam." In particular, he recalled a *fatwah* distributed widely in the Afghan camps "issued by Sheikh Omar Abdel Rahman with his picture on it... It said it was a fatwah by Omar Abdel Rahman from prison. It says fight Americans and hit their interest everywhere." A copy of this very same *fatwah* was reproduced and distributed on a short-lived Arabic-language website created by fellow Millenium terror conspirator Khalil al-Deek.

46. On October 14, 1998, while Ahmed Ressam was making final preparations to return to North America, Canadian authorities apprehended his handler Karim Said Atmani at Niagara Falls, when he tried to cross into Canadian territory from the U.S. with two other Algerians. He was traveling on a fraudulent Canadian passport that had apparently already allowed him to breach immigration controls in the United States; he was also found in the possession of stacks of stolen credit cards taken from unwitting British and Asian tourists. French counterterrorism experts now believe that Atmani was attempting to enter Canada in order to play a central role in the Millenium bombing conspiracy with Ahmed Ressam.

47. In late 1998, Ressam met with several other cell members and al Qaeda representatives in Afghanistan. They agreed to return to Canada in three carefully programmed phases. Atmani, mostly likely back in central Bosnia during the summer of 1998, was scheduled to arrive in Montreal in the third and final phase. Upon the successful return of all the cell

members, Atmani, Ressam, and the others were planning to commit a series of Roubaix-style operations (mainly bank robberies) in order to finance a major terrorist strike against the United States; specifically, a massive bomb explosion at Los Angeles International Airport coinciding with the start of the new millennium. The choice was made because “an airport is sensitive politically and economically.”

48. Ressam later admitted in court the chilling details of his plan: “I will go to the city of Los Angeles. I will surveil the airport. I will survey the airports until I find one—a good one, and then I will bring a cart that is used for luggage. I will put the cart in a place that is not suspicious and then I will observe the reaction of security, how long it took them to observe it... this was for rehearsal only.” Upon the execution of the actual plot, “I will first try to put the explosives in one suitcase and if there was not enough room in one suitcase, then I would use another suitcase.”

49. With Atmani’s expulsion, the cell was starting to fall apart. Ressam had made it safely back to Montreal, but minus one of his most experienced jihad partners. He tried contacting Atmani in Bosnia, but the latter now refused to come back to Canada to carry out an operation. Atmani was clearly a known figure in European and North American counterterrorism circles, and it was too risky for him to once again attempt to illicitly enter Canada or the U.S. With or without Atmani, Ressam was prepared to go ahead with the mission assigned to him by Abu Zubaydah. He was given \$3,500 to help subsidize the cost of the terror attack by Hassan Zemmiri, another known veteran of the “jihad in Bosnia.” Other members of the cell already positioned inside the United States were reassured by their handlers based in Montreal that Ressam “used to be in Afghanistan and Bosnia” and that “the fire is on.” They

referred to Ressam's imminent arrival as "a great blessing"; one conspirator later admitted that he knew exactly what this meant: "[t]his guy was coming for some violent act."

50. On December 14, 1999, Ressam was stopped by U.S. border patrol agents at the Port Angeles crossing near Vancouver. In his car, investigators found the precursors to terror: 100 pounds of explosives and simple timing devices. Ressam tried to escape. One Customs agent recalled, "I was looking right at him, had my weapon pointed in his direction... He quickly darted into traffic, bounced off a car, continued to run hard. And that was what really triggered me, caused me to get very nervous, when he came up to a passenger vehicle and tried to commandeer it or open the car door. I thought, 'This guy really wants to get away, and he's dangerous.'"

Said Bahaji

51. Said Bahaji, the son of a Moroccan immigrant, was the only German citizen in the Hamburg 9/11 cell. Educated in Morocco, Bahaji returned to Germany to study electrical engineering at the Technical University of Hamburg-Harburg. He spent five months in the German army before obtaining a medical discharge, and lived with Mohammed Atta and Ramzi Binalshibh at 54 Marienstrasse for eight months between November 1998 and July 1999. Described as an insecure follower with no personality and with limited knowledge of Islam, Bahaji nonetheless professed his readiness to engage in violence. Atta and Binalshibh used Bahaji's computer for Internet research, as evidenced by documents and diskettes seized by German authorities after 9/11. Said Bahaji attended to various routine matters for Atta and Binalshibh in Hamburg, thereby helping them remain abroad without drawing attention to their absence.

Zakariya Essabar

52. Zakariya Essabar, a Moroccan citizen, moved to Germany in February 1997 and to Hamburg in 1998, where he studied medical technology. Soon after moving to Hamburg, Essabar met Ramzi Binalshibh and the other members of the Hamburg 9/11 cell through a Turkish mosque. Shortly before the 9/11 attacks, Essabar traveled to Afghanistan to communicate the intended date for the suicide hijackings to the al Qaeda leadership.

Mohammed Ali Hasan Al Moayad

53. On January 5, 2003, the United States District Court for the Eastern District of New York issued an Affidavit in Support of an Arrest Warrant against Mohammed Ali Hasan Al Moayad in *U.S. v. Mohammed Ali Hasan Al Moayad* for conspiring to provide material support and resources to al Qaeda between October 8, 1997 and December 17, 2002.

54. Around December 2001, Al Moayad was involved in supplying money, arms and recruits to al Qaeda mujahideen fighters.

55. Around January 8, 2002, an FBI witness traveled to Yemen and met with Al Moayad. Over the course of several conversations, Al Moayad told the witness that he regularly provides money to support mujihadeen fighters in Afghanistan, Chechnya and Kashmir. Al Moayad also stated that he has supplied al Qaeda with arms and communication equipment in the past. Al Moayad indicated that he worked directly for a high-ranking official in the Islah party of Yemen purchasing weapons for al Qaeda.

56. Around May 23, 2002, an FBI witness met with Al Moayad several times in Yemen. The witness told Al Moayad he had a contact who wanted to donate a large sum of money to the jihad, but having previously donated \$2 million to some Egyptians, whom he believed kept the money for themselves, the contact wanted to ensure that the money he donated would go to the jihad. In response, Al Moayad told the witness that he had met with Osama bin

Laden on two occasions and that on each of those occasions, Al Moayad had brought money, arms and recruits. Al Moayad explained that before the September 11, 2001 attack, Al Moayad's funds and supplies went primarily to Afghanistan, but now they were being used mostly in Kashmir and Chechnya.

57. During one of these meetings with the FBI witness, Al Moayad also identified five individuals in New York who were sending money from the United States to him. Al Moayad provided the witness with contact telephone numbers for these individuals and also told him that he received money for the jihad that was collected at the Al Farouq mosque in Brooklyn.

58. On March 10, 2005, Al Moayad was convicted in the Eastern District of New York of conspiracy to provide material support or resources to both al Qaeda and the foreign terrorist organization Hamas.

Ibrahim Muhammad Afandi

59. Ibrahim Afandi is the CEO and General Manager of the Al-Afandi Establishment for Trading Industry. Al-Afandi Est. is involved in marketing and international trade, environment, cement factories, medical equipment and solar energy and is headquartered in Jeddah. In 1998, Ibrahim Muhammad Afandi was a member of the International Islamic Relief Organization (IIRO)'s newly formed Executive Council. In 1989, Ibrahim Afandi attended the first incorporation meeting of the Board of Trustees for Sana-Bell, Inc. U.S. held in Washington, D.C. Sana-Bell, Inc. was named later as a financial branch of IIRO and the Muslim World League.

60. Ibrahim Afandi's name was among those included in the Golden Chain- a list including 20 of some of the most successful and influential merchants in the Arabian Gulf. The

list, titled “And spend for God’s cause,” was identified by former al Qaeda lieutenant-turned FBI informant Jamal Ahmed Al-Fadl as consisting of wealthy individuals from the Gulf region who provided bin Laden and al Qaeda with money on a regular basis.

Abdulrahman Hassan Sharbatly

61. The Sharbatly family name was among those included in the Golden Chain. The Al-Sharbatly family is the founder of Saudi Arabia’s second biggest bank, Riyad Bank. The family owns major financial investments around the world, including the Golden Pyramids Plaza Co., a multi-billion dollar hotel, residential, and commercial project in Egypt. The family is believed to own a great deal of other property including 38 million square miles of land along the Jeddah-Mecca expressway. Abdulrahman Sharbatly, a principle public figure in his family, is a major shareholder in the Golden Pyramids project and the Egyptian Gulf Bank. He is also a business partner of Salem Mohammed Binladin and founder of the Beirut-based Middle East Capital Group (MECG), with an estimated \$210 million in capital, much of it held personally by Sharbatly.

Ahmed Zaki Yamani

62. Ahmed Zaki Yamani’s name was among those included in the Golden Chain. Yamani was the longtime Oil Minister for the Kingdom of Saudi Arabia. After serving loyally for many years, Yamani was suddenly dismissed from his position in the late 1980s when King Fahd apparently held him responsible for a price war with non-OPEC countries that pushed petroleum prices below \$10/barrel.

Ahmad Al Harbi

63. Ahmad Al-Harbi’s name was included in the Golden Chain. Al-Harbi was a business partner of Saudi Prince Mohammad Al-Abdullah Al-Faisal in at least one venture worth

over 1 million Saudi Riyals. He is also the corporate administration manager for Saudi Investment Group & Marketing (SIGMA), a conglomerate holding company set up by the late Saudi Prince Khalid, the eldest son of Prince Abdullah.

Mohammed Al-Issai

64. Mohammed Al-Issai's name was included in the Golden Chain. Al-Issai is a board member of Saudi Research Marketing Company alongside Mohammed Hussein al-Amoudi, Saleh Abdullah Kamel, Abdullah Bin Khalid Bin Mahfouz, and Dallah Albaraka Group. He is also the deputy chairman of the Arab Cement Company whose shareholders include the Saudi Binladin Group, Bin Mahfouz, and the Al-Rajhi family.

Hamad Hussaini

65. Hamad Hussaini's name was among those included in the Golden Chain. Hussaini is a board member of the Islamic Waqf Foundation in the Netherlands and is the brother of the General Director of Al-Waqf and owner of the local Al-Furqan Mosque which is linked to 9/11 hijacker Marwan el-Shehhi.

Mohamed Loay Bayazid (a.k.a. Abu Rida Al Suri)

66. Mohamed Loay Bayazid, (a.k.a. Abu Rida Al Suri), a Syrian-American from Kansas City, Missouri, is a former senior member of al Qaeda and a close confidant of Osama bin Laden.

67. Around 1985, Mohamed Bayazid first left his home in the United States in order to support the mujahideen in Afghanistan. He arrived in Peshawar around the same time as Saudi citizen Wael Jalaidan, another intimate friend of bin Laden. After making contact with Sheikh Abdullah Azzam, Bayazid traveled into Afghanistan to the Salman Al-Farisi training camp. At roughly the same time, he first met the young Saudi expatriate Osama bin Laden.

68. Over the next decade, Bayazid played a key role as an advisor and emissary for Bin Laden, directly aiding al Qaeda's attempts to gain chemical, biological, and nuclear weapons.

69. In the early 1990s, Bayazid attempted to illegally purchase South African uranium on behalf of bin Laden, only to be defrauded of thousands of dollars.

70. Mohamed Bayazid was last reported in the Kansas region around the period of 1994. During this time bin Laden's dissident political group, the Advice and Reformation Committee (ARC), maintained a postal correspondence address in Kansas City.

71. Mohamed Bayazid worked for a short time with Human Concern International (HCI) during the late 1980s. He was specifically responsible for acting as a coordinating liaison based in the Midwestern United States between HCI and other Islamic charitable organizations. By 1995, French intelligence sources were telling European media that HCI has a humanitarian front, but it is believed to finance terrorist and guerrilla operations. In June 1999, HCI was formally accused by the Canadian government of supporting international Islamic terrorism. On October 12, 2001, Ahmed Saeed Khadr, HCI's representative in Pakistan, was registered by the US Treasury Department as a "Specially Designated Terrorist" for aiding al Qaeda.

Ahmed Brahim

72. Ahmed Brahim, an Algerian, helped finance the 1998 bombing of U.S. embassies in Kenya and Tanzania. He was arrested in Barcelona in April 2002. Spanish Interior Minister Mariano Rajoy described the arrest of Brahim—the result of a seven-month long police investigation—as a "heavy blow to the finance apparatus of this terrorist network." Brahim had a

close relationship with Mamdouh Mahmud Salim (a.k.a. Abu Hajar al-Iraqi), the former top military commander of al Qaeda in Afghanistan. Salim, a founding member of al Qaeda, is in prison in the US for conspiracy in the 1998 embassy bombings.

Abu Musab Al-Zarqawi (a.k.a. Ahmed al-Khalayleh)

73. Abu Musab al-Zarqawi (a.k.a. Ahmed al-Khalayleh), a Jordanian national of Palestinian descent, joined the Arab-Afghan mujahideen in the late 1980s. Osama bin Laden and other al Qaeda commanders decided that Zarqawi would be useful in marshalling together Palestinian al Qaeda followers in a unified structure, and they helped Zarqawi to establish the “Bayat” camp in western Afghanistan.

74. In 2002 and 2003, Zarqawi began to extend his network throughout Turkey, Jordan, Iraq, Syria, Lebanon, and the Caucasus. Several followers of Zarqawi were responsible for subsequent terrorist attacks in the region, including suicide bombing attacks targeting foreigners in Istanbul, Turkey and the assassination of U.S. diplomat Lawrence Foley in Jordan.

75. Shortly following the U.S. invasion of Iraq in mid-2003, Zarqawi established his principle base in Iraq’s Sunni triangle where he organized a relentless and deadly insurgent campaign featuring suicide bombings and the televised beheadings of Western civilian hostages. Zarqawi is allegedly personally responsible for beheading U.S. hostage Nicholas Berg in May 2004.

76. In November 2004, Abu Musab al-Zarqawi officially swore bayat, or an oath of allegiance, to Osama Bin Laden and became a recognized leader of al Qaeda. Under the lead of Zarqawi, al Qaeda’s network in Iraq has been responsible for thousands of deaths inside Iraq and also acknowledges providing assistance to other al Qaeda movements in the region—including al Qaeda’s network in Saudi Arabia.

Ayman Al-Zawahiri

77. Ayman al-Zawahiri is the leader of the Egyptian Islamic Jihad Movement and is considered right-hand-man to Osama bin Laden. He is the undisputed second most important leader in al Qaeda and recently took credit for the July 7, 2005 London suicide bombing attacks.

Abu Ibrahim Al-Masri

78. Abu Ibrahim al-Masri was a would-be al Qaeda activist operating out of Yemen who was turned over to Yemeni security. An al Qaeda sympathizer in the state security service informed his terrorist commanders. Al-Masri was caught, escaped, caught again, interrogated, and confessed. A prolonged debate ensued as to his fate, and in the end, he was set free. It was believed that his shame before the rest of the organization was sufficient, and other terror groups were cautioned against having any dealings with him. Masri wandered about before winding up in Afghanistan, a religious teacher at a school for the children of Arab Afghans.

Mohammad J. Fakihi

79. Mohammad J. Fakihi, director of the Islamic Affairs Department at the Saudi Embassy in Berlin, has been tied to al Qaeda and alleged September 11th conspirators active in Germany. In March 2003, German authorities detained and interrogated six suspected Muslim militants tied to the Al-Nur mosque in Berlin. One of these men, Tunisian-born Ihsan Garnooui, was arrested after a search of his belongings uncovered a poison handbook, bomb-making ingredients, a loaded handgun, and a stolen passport. Masjid Al-Nur had already come under scrutiny for its links to Mohammad J. Fakihi. Reportedly, German investigators were also examining the role of the Al-Haramain Foundation in funding and sponsorship of the Al-Nur mosque. Shaykh 'Aqeel Ibn 'Abdul-'Aziz Al-'Aqeel, the "general director" of Al-Haramain is listed as a co-owner of the land the mosque sits on, which was purchased only months after the arrival of Fakihi at the Saudi Embassy in Berlin.

Mohamed Bin Mohamed Abdelhedi

80. In June 2004, the U.S. Government named Mohamed Abdelhedi as a Specially Designated Global Terrorist (SDGT) for his role in a ten-man al Qaeda cell in Italy associated with the Salafist Group for Preaching and Combat (GSPC) and other Islamic terrorists groups operating around the globe. The U.S. has information that this terrorist cell was engaged in the trafficking of arms and chemical materials. In addition, militant members of the organization were able to immigrate to Italy because the cell was supplying them with false documentation and other logistical support.

81. Abdelhedi was specifically described within the cell as having engaged in criminal acts with the intent to profit from clandestine immigration and false documentation.

Kamel Darraji

82. In June 2004, the U.S. Government named Kamel Darraji a Specially Designated Global Terrorist (SDGT) for his role in the ten-man al Qaeda cell in Italy which was associated with the Salafist Group for Preaching and Combat (GSPC) and other Islamic terrorists groups operating around the globe and was engaged in the trafficking of arms and chemical materials.

83. Darraji was specifically described within the cell as having supplied false documentation to illegal aliens.

Imed Ben Bechir Jammali

84. In June 2004, the U.S. Government named Imed Jammali as a Specially Designated Global Terrorist (SDGT) for his role in the ten-man al Qaeda cell in Italy which was associated with the Salafist Group for Preaching and Combat (GSPC) and other Islamic terrorists

groups operating around the globe and was engaged in the trafficking of arms and chemical materials.

85. Jammali was specifically described within the cell as having supplied false documentation to illegal aliens.

Habib Ben Ahmed Loubiri

86. In June 2004, the U.S. Government named Habib Loubiri as a Specially Designated Global Terrorist (SDGT) for his role in the ten-man al Qaeda cell in Italy which was associated with the Salafist Group for Preaching and Combat (GSPC) and other Islamic terrorists groups operating around the globe and was engaged in the trafficking of arms and chemical materials.

87. Loubiri was specifically described within the cell as having run a cooperative society used to raise funds for extremist activity, most notably for the GSPC.

Chabaane Ben Mohamed Trabelsi

88. In June 2004, the U.S. Government named Chabaane Trabelsi as a Specially Designated Global Terrorist (SDGT) for his role in the ten-man al Qaeda cell in Italy which was associated with the Salafist Group for Preaching and Combat (GSPC) and other Islamic terrorists groups operating around the globe and was engaged in the trafficking of arms and chemical materials.

89. Trabelsi was specifically described within the cell as having supplied false documentation to illegal aliens.

Sewar Al Dhahab

90. General El-Dahab is a former military dictator of the Sudan and the current honorary President of the Sudanese Islamic Call Organization (ICO), a.k.a. *Al-Munzamaat Al-*

Dawa Al-Islamiyya (MDI). During his term of martial law, Al-Dhahab upheld relative strict Islamic shari`a law in the Sudan. In 1985, his government initiated a deliberate policy “of arming Arab tribal groups” in order to offset the influence of the Sudanese People’s Liberation Army (SPLA). Those Islamic militia groups have been subsequently accused of gross human rights violations, including the standardized practice of slave-trading. MDI/ICO’s main Sudanese bank account for donations is hosted by the Al-Shamal Islamic Bank in Khartoum. Al-Shamal is reputed to have been created as a joint project between the Sudanese National Islamic Front (NIF) and Osama bin Laden, who allegedly invested \$50 million of his own personal funds in the bank.

Abu Hamza Al Masri (a.k.a. Mustafa Kamel, “Le Manchot”)

91. Sheikh Abu Hamza al-Masri (a.k.a. Mustafa Kamel, “Le Manchot”) is an exiled fundamentalist dissident originally from Alexandria, Egypt now living in London. From the UK, he operates an organization known as the Supporters of Shariah (a.k.a. SOS, *Ansar al-Shareeah*), which admitted on its former website to supporting the mujahideen in Afghanistan, Bosnia, Kashmir, etc., including recruiting and aiding front line soldiers.

92. During the mid-1990s, Abu Hamza maintained a close relationship with the Algerian Armed Islamic Group (GIA) terrorist network in Europe and helped them by coordinating fundraising efforts and publishing their *Al-Ansaar* newsletter. Until recently, Abu Hamza was also the firebrand cleric at the notorious Finsbury Park Mosque in northeast London.

93. Immediately after the September 11th suicide hijackings, Abu Hamza gave a sermon titled “The World Trade Series: The Believers vs. the Infidelity of America,” in which he thundered, “Terrorism is a tool for everybody to get his way. And it has also been a tool for Islam... It is a tool, it is a weapon. Allah said, to terrorize the enemies of Allah and your

enemies, it is a weapon, and it is a very effective weapon. And if you leave this weapon, then Allah's destruction and wrath will be upon you." He also has called Osama bin Laden a "victim from the American policies" and a "good-hearted person."

94. European intelligence agencies have concluded that Abu Hamza is an integral recruiter and financier of the North African al Qaeda sleeper cell network and a major figure in the overall European "foreign legion" of al Qaeda.

95. Abu Hamza's son and godson were convicted in 1999 in a Yemeni court for taking part in an attempted bombing conspiracy against "un-Islamic" targets in that country.

96. Also that year, the militant cleric was profiled in a British documentary. One of his sermons cited in the documentary was a call for Muslims to "get training" in order to "get the [infidel] and crush his head in your arms, so you can wring his throat, so you can whip his intestines out. That's why you are doing training... to rip the people to pieces. Forget wasting a bullet on them... cut them in half!" In the same video, Abu Hamza is shown at a conference explaining a diagram for the "Muslim Anti-Aircraft Net," a design for a floating net laced with mines intended to randomly entrap and destroy civilian passenger aircraft in Great Britain and the U.S. In a later press release about the conference, SOS representatives explained that the anti-aircraft grid was

"designed by our Brothers in Afghanistan. These nets will increase the hazard and risk to flying, and are a response to the destructive inventions of the infidel West... These nets, if mass produced, can cost less than £10, and are undetected by radar. They can be launched from any point, and move to anywhere in the world. We urge all brothers and sisters to also begin thinking of designs and techniques such as these, because the time for talking has long since passed."

Ramzi Ahmed Yousef

97. Ramzi Yousef is the nephew of senior al Qaeda terrorist mastermind Khalid Shaykh Mohammed, and he was the mastermind behind the 1993 World Trade Center bombing

in New York. A former al Qaeda member testified in U.S. court that Yousef attended the Al-Sadda terrorist training camp along the Pakistani-Afghan border during 1988. The Al-Sadda camp was described in the founding minutes of al Qaeda as an “open camp” from which the best “brothers” would be selected to join the new terrorist organization. A corresponding number of Al-Sadda graduates went on to serve key roles in the international *jihad* movement.

98. On February 26, 1993, disciples of the Arab-Afghan movement executed their first successful terrorist strike on the American homeland. A rental truck packed with powerful explosives detonated in an underground parking lot below the World Trade Center, killing six bystanders and causing havoc in downtown Manhattan. The chief bombmaker was Ramzi Yousef, and through additional intelligence and investigative efforts in 1995, Khalid Shaykh Mohammed was also connected to the bombing.

99. Under interrogation, Ramzi Yousef admitted having fled Kuwait following the 1990 Iraqi invasion and enrolling in a six-month comprehensive training course (among a class of 55 other *jihadi* recruits) at various *mujahideen* camps in Afghanistan, learning “explosives, defensive tactics, weapons use, etc.” Several Arabic bomb-making manuals destined for Yousef were discovered inside an envelope marked with the letterhead of *Lajnat Al-Birr Al-Islamiyya*, (a.k.a. Benevolence International Foundation), the now designated al Qaeda financial front group.

100. Following his later capture in Pakistan, Yousef told FBI agents that “he wished... to cause the tower to fall... [h]e indicated that, had he been able to obtain additional financing, he would have been able to construct the device in such a way as to focus more of the blast horizontally, against the ‘beam’ of the World Trade Center tower, and would have been able to topple one tower into the other.” Yousef envisioned the flaming wreckage of the twin structures

crashing down upon the Wall Street district, crippling the economic heart of America and killing perhaps as many as 250,000 innocent people. When an FBI agent pointed out the still-standing Trade Center to Yousef on his way to trial in 1995, he thought for a moment and replied, “Next time, if I have more money... I’ll knock it down.” At the time, Yousef also acknowledged to the FBI that “he was familiar with the name Osama Bin Laden” but refused to elaborate further.

Abu Bakar Bashir

101. In the 1960s, radical cleric Abu Bakar Ba’asyir (Bashir) established a pirate radio station in Indonesia that advocated the imposition of sharia, which got him into trouble with the Soeharto regime. In 1972, he and Abdullah Sungkar, a fellow cleric, established an Islamic boarding school in Solo, Al Mukmin. The school which opened with 30 students grew rapidly and in 1976 they moved to a 4 hectare compound outside of the city; it now has 1,900 students. The school continued to attract more pupils, one of whom was Fathur Rohman al Khozi, who like many other graduates, went on to study in Egypt’s Al Azhar University or Pakistani or Saudi Arabian madrassas. The school taught a hardline and littoral interpretation of Islam based on Wahabism and the philosophies of the 19th century Islamic cleric Mohammed Abdu Rahid Rida.

102. In 1978, Ba’asyir and Sungkar were arrested and sentenced to nine years for violating a 1963 subversion law. A second court upheld the conviction but lessened the sentence to 4 years, and they were released in 1982. In 1985, the Supreme Court overturned the appeals court’s conviction and re-imposed the original 9 year sentence; both immediately fled to Malaysia. The two found a safe haven in Malaysia where they lived and preached openly for several decades and built up a large following of radical Indonesians who had fled the Soeharto regime and radical Malays. They lived in a small town on the Malacca Strait that had ferry service to Indonesia and heavy flows of traffic between the two states. The two served as a way

station for Indonesians and Malaysians who were on their way to Afghanistan and Pakistan to study and fight the soviets or train in one of the 40 al Qaeda camps that were established in the late 1990s. They were revered figures with large and devoted followers. Their speeches attacking the New Order regime and demanding the implementation of sharia won them a hardcore following.

103. Ba'asyir and Sungkar linked up with a radical Indonesian cleric, Mohammad Iqbal Rahman, (a.k.a. Abu Jibril). Jibril also trained in Afghanistan and was imprisoned in Indonesia in the early 1980s and went into self-exile in Malaysia upon his release. Jibril became a trainer in Afghan camps, and was seen as "head of training" for al Qaeda in all of Southeast Asia. Jibril was detained by Malaysian authorities under the ISA for militant activities in the summer of 2001.

Sungkar and Ba'asyir returned to their pesentren in Solo Indonesia in 1999 once the Soeharto regime collapsed and democracy was restored, though Sungkar died shortly thereafter. In mid-2000, Ba'asyir established the Majelis Mujiheddin of Indonesia (MMI) based in Yogyakarta. The MMI is thought to be a front for Abu Bakar Ba'asyir's more militant activities, and Ba'asyir recruited hundreds of followers to fight the Americans in Afghanistan in the fall of 2001. The MMI is part of a regional network, and one of the MMI's board members is Mohammad Iqbal Rahman.

Abdul Hakim Murad

104. Abdul Hakim Murad was captured by Philippine authorities for his involvement in Ramzi Yousef's 1994 plot to detonate explosives aboard eleven U.S. airliners simultaneously over the Pacific and afterward conduct "bombing operations" during a visit by the Pope to the Philippines in January 1995.

105. In 1994, Ramzi Yousef began developing these terrorist plots with his uncle, Khalid Shaykh Mohammed—the admitted mastermind behind the September 11 suicide hijackings. Yousef and his uncle found Abdul Hakim Murad, a fairly experienced Muslim pilot willing to answer their questions and to participate in their future violent schemes. When Murad was captured by authorities in the Philippines, he admitted under interrogation that Mohammed and Yousef intended to suicide-crash a commercial aircraft into the CIA headquarters outside Washington D.C. According to his interrogators, Murad said the idea came out during his casual conversation with Ramzi Yousef and there was no specific plan yet for its execution. What Murad had in mind was he would board any American commercial aircraft pretending to be an ordinary passenger and instead of using a bomb or any explosive in the execution, it would be a suicidal mission that he was very much willing to execute. He said all he needed was to be able to board the aircraft with a pistol so that he could execute the hijacking. Ramzi particularly admired the struggle of North African Islamic militant groups like the GIA and lectured to Murad about the significance of their terrorist activities.

Tawfiq Bin Attash, a.k.a. Khallad

106. Tawfiq Bin Attash, (a.k.a. Khallad), is a senior Yemeni al Qaeda operative described as one of the masterminds behind the bombing of the U.S.S. Navy destroyer Cole in Yemen on October 12, 2000. He is also considered to be a facilitator of the 9/11 suicide hijackings. Khallad was one of the operatives initially personally selected by bin Laden to serve as a suicide hijacker in the early stages of the 9/11 plot.

107. Khallad's father was expelled from Yemen because of his extremist views, and Khallad grew up in Saudi Arabia, where his father knew bin Laden, Abdullah Azzam, and Omar

Abdel Rahman (the “Blind Sheikh”). Khallad departed for Afghanistan in 1994 at the age of 15. Three years later he lost his lower right leg in a battle with the Northern Alliance, a battle in which one of his brothers died. After this experience, he pledged allegiance to bin Laden—whom he had first met as a child in Jeddah—and volunteered to become a suicide operative.

108. When Khallad applied for a U.S. visa, his application was denied. Earlier in 1999, bin Laden had sent Khallad to Yemen to help Nashiri obtain explosives for the planned ship-bombing and to obtain a visa to visit the United States, so that he could participate in an operation there. Khallad applied under another name, using the cover story that he would be visiting a medical clinic to obtain a new prosthesis for his leg. Another al Qaeda operative gave Khallad the name of a person living in the United States whom Khallad could use as a point of contact on a visa application. Khallad contacted this individual to help him get an appointment at a U.S. clinic. While Khallad was waiting for the letter from the clinic confirming the appointment, he was arrested by Yemeni authorities. The arrest resulted from mistaken identity: Khallad was driving the car of another conspirator in the ship-bombing plot who was wanted by the Yemeni authorities.

109. Khallad was released sometime during the summer of 1999, after his father and bin Laden intervened on his behalf. Khallad learned later that the al Qaeda leader, apparently concerned that Khallad might reveal Nashiri’s operation while under interrogation, had contacted a Yemeni official to demand Khallad’s release, suggesting that bin Laden would not confront the Yemenis if they did not confront him.

110. Giving up on acquiring a U.S. visa and concerned that the United States might learn of his ties to al Qaeda, Khallad returned to Afghanistan. During the spring and summer of 1999, KSM realized that Khallad and Abu Bara, both of whom were Yemenis, would not be able

to obtain U.S. visas as easily as Saudi operatives like Mihdhar and Hazmi. Although Khallad had been unable to acquire a U.S. visa, KSM still wanted him and Abu Bara, as well as another Yemeni operative from bin Laden's security detail, to participate in the plane operation. Yet because individuals with Saudi passports could travel much more easily than Yemeni, particularly to the United States, there were fewer martyrdom opportunities for Yemenis. Khallad traveled around East Asia in 1999 and 2000 in order to help plan possible hijackings on aircraft in connection with an early idea for what would become the 9/11 plot.

111. Shortly after the U.S.S. Cole bombing in October 2000, the Yemeni government provided the FBI with new information from the interrogations of suspects, including descriptions of individuals from whom the detainees had received operational direction. One of them was Khallad, who was described as having lost his leg. The detainees said that Khallad helped direct the Cole operation from Afghanistan or Pakistan. The Yemenis judged that the man described as Khallad was Tawfiq bin Attash. An FBI special agent recognized the name Khallad and connected this news with information from an important al Qaeda source who had been meeting regularly with CIA and FBI officers. The source had called Khallad bin Laden's "run boy," and described him as having lost one leg in an explosives accident at a training camp a few years earlier. To confirm the identification, the FBI agent asked the Yemenis for their photo of Khallad. The Yemenis provided the photo on November 22, reaffirming their view that Khallad had been an intermediary between the plotters and bin Laden. (In a meeting with U.S. officials a few weeks later, on December 16, the source identified Khallad from the Yemeni photograph.) U.S. intelligence agencies had already connected Khallad to al Qaeda terrorist operations, including the 1998 embassy bombings.

Samir Salah

112. Samir Salah serves as a corporate officer of Taibah International Aid Association. Taibah reported to the IRS that it is “a missionary in the United States to promote the Muslim faith and to aid needy Muslims world-wide.” Taibah International, headquartered in the Northern Virginia suburbs of Washington D.C., maintained international branch offices in Sarajevo, Bosnia; Tirana, Albania; and Moscow, Russia. Taibah’s central office in Falls Church, Virginia, was co-founded by, among others, Osama Bin Laden’s nephew Abdullah. Yet, in IRS exemption forms submitted in 1999 and again in 2000, Abdulrahman Alamoudi is listed as the corporate vice president. Moreover, court documents filed in Alamoudi’s case cite financial transfers totaling at least \$35,000 from the Success Foundation—a Northern Virginia Muslim charity chaired by Alamoudi—to Taibah International in Bosnia. When interviewed by FBI agents, the acting director of Taibah’s Bosnian branch insisted that it was Alamoudi’s Taibah office in Northern Virginia that would be responsible for choosing the next regional director in Bosnia.

113. Shortly after the September 11 suicide hijackings, Taibah came under intense scrutiny by Bosnian intelligence and law enforcement officials after the Interior Ministry claimed to have averted a terror attack involving a computer consultant and suspected al Qaeda member working for Taibah. Between October 17 and 21, 2001, Bosnian authorities detained at least eleven Islamic militants suspected of planning to collect a small armada of light planes and helicopters from Visoko airfield and suicide-crash them into NATO military installations in the Balkans. The information had come from an intelligence intercept on October 16 in Sarajevo of a conversation discussing U.S. bombing in Afghanistan and “what the response should be” in Europe. After a discussion of hitting a collection of American and British targets in the region, the callers ended with a definite “Tomorrow, we will start.” During the Bosnian anti-terror raids,

local police discovered contact numbers for senior al Qaeda terrorist recruiters and other phone records indicating over 70 calls to various locations in Afghanistan in the one month alone immediately following the September 11 attacks. Many of those implicated in the plot were found to be employees of Saudi-funded Islamic charitable organizations. One such conspirator was Mustafa Ait-Idir, a 31-year old computer specialist working for the Bosnian branch of Taibah International (despite his having falsely obtained Bosnian citizenship). According to an FBI report, Ait-Idir later admitted to investigators that Taibah International was responsible for representing the local interests of the Global Relief Foundation (GRF) after it was officially shut down by the Bosnian government. Ait-Idir added that another Taibah employee, Mohammad Ibrahim, was directly responsible for GRF's concerns in the Sarajevo area. GRF was named in an October 2002 U.S. executive order as a Specially Designated Global Terrorist (SDGT) for allegedly providing material support to al Qaeda, including "ammunition" for would-be "holy warriors." When Abdurahman Alamoudi was first detained in London in August, his palm pilot contained the contact information for Mohamed Chegade, a former top GRF official in the U.S. Consequently, an official Bosnian investigation on Taibah International cited by The Wall Street Journal found evidence of "fictitious declarations of affiliation and employment" and of visas for entry into Bosnia for suspected militants. It concluded that "large cash sums were withdrawn by [Taibah] management... which were never accounted for," indicating "a wide scope for possible illegal spending."

Ayadi Chafiq Bin Muhammad

114. On October 12, 2002, the U.S. Treasury Department officially named Chafiq Ayadi as a Specially Designated Global Terrorist (SDGT) and ordered that his personal assets be frozen. A Treasury Department press release stated that Chafiq Ayadi is connected to the bin

Laden financial network through the Muwafaq Foundation in Munich, Germany and described Muwafaq as an al Qaeda front that receives funding from wealthy Saudi businessmen who have been transferring millions of dollars to bin Laden through Muwafaq.

115. The Saudi-based Muwafaq Foundation was headed by businessman and philanthropist Yasin Abdullah al-Qadi, who was also officially named as a Specially Designated Global Terrorist (SDGT) by the U.S. Treasury Department and had his assets frozen on October 12, 2002. Muwafaq was a well-funded and influential NGO providing aid to the Arab *mujahideen*. In an interview with *As-Sharq al-Awsat*, al-Qadi explained that Muwafaq was originally conceived by a collection of wealthy Saudis who wanted to aid “disaster-stricken Muslim brothers in several areas of conflict.” Subsequently, the foundation opened a regional bureau in Bosnia in the early 1990s affiliated with the “Croatian Islamic Center.” When the old director was fired from the regional Bosnia office, Qadi and the other leaders of Muwafaq needed to fill the vacancy. Wael Jalaidan, bin Laden’s old *jihad* partner in Afghanistan, nominated Chafiq bin Muhammad Ayadi, a veteran Tunisian Arab-Afghan guerilla, for the post.

116. Wael Jalaidan had first met Ayadi in Pakistan, shortly after Ayadi was treated in Saudi Arabia for combat wounds suffered in Afghanistan. Upon his return to the region, Ayadi began working for the Muslim World League under the direct tutelage of Jalaidan. In 1993, Ayadi suddenly asked his boss to help him find a new job in the European offices of any amenable Islamic charitable group. Jalaidan, aware of the vacancy at the Muwafaq office, asked al-Qadi (a close family friend) to hire Ayadi. According to al-Qadi:

Thus, the Tunisian militant became a trusted associate of al-Qadi and, as a result, a key financial conduit for Saudi *jihad* funds.

In July 1996, al-Qadi even registered his shares owned in the local Depozitna Banka in several names, including that of Chafiq Ayadi.

117. At the end of the war in 1995, several of the foreign relief agencies closed their local offices, including Muwafaq. Al-Qadi then helped arrange a substitute banking job for Ayadi at Depozitna Banka. Bosnian sources say Ayadi used his position at Depozitna Banka as a cover to facilitate assorted “dubious” financial transactions involving accounts controlled by Muwafaq, “Euroinvest” (an investment corporation co-owned by Wael Jalaidan and Yasin al-Qadi), and other unidentified companies in Saudi Arabia. During this time, Ayadi was also suspected by Bosnian authorities of cigarette smuggling, reselling stolen humanitarian goods, and laundering money to fund terrorist activities. Following two lucrative years at Depozitna, the bank management suddenly fired Ayadi.

Muhammad Ali Harrath

118. Muhammad Ali Harrath is the alleged coordinator for the Al-Haramain Islamic Foundation in the U.K. and is also a reputed leader of the radical Tunisian Islamic Front (FIT).

Abu Muhammad Al-Maqdesi, (a.k.a. Issam Al-Burqawi)

119. Issam al-Barqawi is a widely known Salafist cleric and ideologue in Jordan. Barqawi has served as the primary spiritual “mentor” to a number of well-known Palestinian and Jordanian terrorist leaders within al Qaeda, including Abu Musab al-Zarqawi and Abu Anas al-Shami (a.k.a. Omar Yousef Jumah). He is considered to be the “Safar al-Hawali” of Jordan and is reputed to have served a role in helping Zarqawi originally establish his Bayat training camp in Afghanistan.

9/11 Hijackers

120. Khalid al Mihdhar, Majed Moqed, Nawaf al Hazmi, Salem al Hazmi, Hani Hanjour, Satam M.A. al Suqami, Waleed al Shehri, Wail al Shehri, Mohamed Atta, Abdul Aziz al Omari, Marwan Al-Shehhi, Fayez Banihammad, Ahmed al Ghamdi, Hamza al Ghamdi, Mohand al Shehri, Saeed al Ghamdi, Ahmad al Haznawi, Ahmed al Nami, and Ziad Samir Jarrah were the nineteen hijackers who were all members of Osama bin Laden's al Qaeda terrorist group. Fifteen of the nineteen suicide hijackers were Saudi Arabian nationals. All received sponsorship, training, support and funding through Osama bin Laden and his al Qaeda terrorist network.

121. Hijacker Wail al Shehri frequented Al-Seqley mosque where he was recruited into bin Laden's al Qaeda network. He left Saudi Arabia to go to Afghanistan via Pakistan around March 2000 with his younger brother Waleed and Ahmed al Nami. In Afghanistan he trained at Al-Farooq camp in Khandahar on hand-to-hand combat, bomb making, and poison mixing. Osama bin Laden used the camp to train his followers. After nine months of training in Afghanistan he returned to Saudi Arabia in December 2000, and then he traveled to the United States. Wail's father, Mohamed al Shehri, was a wealthy businessman and friend of Mohamed bin Laden, Osama's father. Wail was on American Airlines #11 which crashed into the North Tower of the World Trade Center.

122. Hijacker Waleed al Shehri, Wael's younger brother, is from the southern city of Khamis Mushayet. He also frequented Al-Seqley mosque and joined his older brother in their travel to Afghanistan and the United States. He was on American Airlines #11 which crashed into the North Tower of the World Trade Center.

123. Hijacker Abdulaziz al Omari is a graduate of Imam Mohamed Bin Saud University, Qaseem branch, where he met and befriended several clerics such as Suliman al

Alwan who was mentioned in an Osama bin Laden tape. He also studied at the hand of senior official cleric Shaikh Saleh Al-Fawzan. He left for Afghanistan in December 2000 and was trained at Al-Farooq camp in Khandahar. He was on American Airlines #11 which crashed into the North Tower of the World Trade Center.

124. Hijacker Nawaf al Hazmi is believed to be part of the recruiting group which attracted dozens of Saudi youths into bin Laden's al Qaeda network and the Chechnya war. He was trained in Afghanistan at Al-Farooq camp in Khandahar. He was on American Airlines #77 which crashed into the Pentagon.

125. Hijacker Salem al Hazmi left with his older brother Nawaf to go to Afghanistan in March 2000. He was on American Airlines #77 which crashed into the Pentagon.

126. Hijacker Fayez Banihammad was part of an official relief agency. He left Saudi Arabia in late 2001 to go to Pakistan and then to Afghanistan. His last call to his family was in March 2001 from undisclosed location believed to be the United States. He boarded United Airlines #175 which crashed into the South Tower of the World Trade Center.

127. Hijacker Mohand al Shehri was recruited into bin Laden's Saudi network from the university, which is a hotbed of religious activities and exhibitions about Chechnya and Afghanistan. The university mainly graduates religious imams and has 10 campuses around the world including Washington D.C. and Tokyo. Mohand called his family in early March 2001 from an undisclosed location to say goodbye. He was to board United Airlines #175 which crashed into the South Tower of the World Trade Center.

128. Hijacker Hamza al Ghamdi graduated from the Koranic high school in Beljurashi city. He left the Kingdom around February 2000 to go to Pakistan and then to Afghanistan. He spent a year there before returning to Saudi Arabia and obtaining a visa to travel to the U.S. He

called his parents in July 2001 to ask them for forgiveness and to pray for him, without indicating his whereabouts. He was on board United Airlines #175 which crashed into the South Tower of the World Trade Center.

129. Hijacker Ahmad al Haznawi was a student at the religious university of Um Alqura in Makka for two months before he was recruited to join bin Laden's network. He dropped out to travel to Khandhar, Afghanistan. He left the Kingdom in March 2000 and then returned in December 2000, when he obtained a visa to the U.S. and met with his family. Ahmad called his mother in August 2001 from the United States but told her he was in Chechnya. He was on board United Airlines #93 which crashed in Stony Creek Township.

130. Hijacker Saeed al Ghamdi was on board United Airlines #93 which crashed in Stony Creek Township.

131. Hijacker Ahmed al Nami left the Kingdom February 2000 after he was recruited to fight with Chechen rebels. He was a student at the Abha branch of Imam Mohamed Ben Saud University, the main religious university in the country. He was trained in Khandahar, Afghanistan and stationed at the Khandahar airport. His family received the last call from him in June 2001 at the same time Hamza al Ghamdi called his family. Al Nami was on board United Airlines #93 which crashed in Stony Creek Township.

132. Hijacker Khalid al Mihdhar was on American Airlines #77 which crashed into the Pentagon.

133. Hijacker Majid Moqed was a student at King Saud University in Riyadh. He was on American Airlines #77 which crashed into the Pentagon.

134. Hijacker Hani Hanjour was working as a pilot for Emirates Airlines in the United Arab Emirates. His father was a contractor for the Saudi Armed forces. He was the pilot of American Airlines #77 which crashed into the Pentagon.

135. Hijacker Satam al Suqami was a student at King Saud University in Riyadh where he met Majid Moqed. He was on American Airlines #11 which crashed into the North Tower of the World Trade Center.

136. Hijacker Mohamed Atta, part of the al Qaeda cell in Hamburg, Germany, was the pilot of American Airlines #11 which crashed into the North Tower of the World Trade Center.

137. Hijacker Marwan al Shehhi, part of the al Qaeda cell in Hamburg, Germany, was the pilot of United Airlines #175 which crashed into the South Tower of the World Trade Center.

138. Hijacker Ahmed al Ghamdi was on board United Airlines #175 which crashed into the South Tower of the World Trade Center.

139. Hijacker Ziad Jarrah, part of the al Qaeda cell in Hamburg, Germany, was the pilot of United Airlines #93 which crashed in Stony Creek Township.